

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA

Plaintiff,

Criminal No. 11-20468

v.

Hon. Arthur Tarnow

D-36 VINOD PATEL,

Defendant.

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SUPPLEMENTAL DISCOVERY NOTICE

8. The government intends to offer evidence under Rule 404(b), Fed. R. Evid.  
Yes   X   No        Unsure

Through this notice, the United States hereby informs Vinod Patel of its intent to introduce as Rule 404(b) and/or inextricably intertwined evidence that the defendant engaged in health care fraud with individuals and entities outside of Babubhai Patel's control. Specifically, the government intends to introduce evidence of the following:

In late 2010, Vinod Patel opened a pharmacy with co-defendant Atul Patel called Beecher Pharmacy, which operated in Mt. Morris, Michigan. Vinod Patel was an owner of this pharmacy. Beecher Pharmacy was not owned by or affiliated with Babubhai Patel. However, at Vinod Patel's direction, this pharmacy engaged in billing insurers for medications that were not dispensed. Atul Patel and Vinod Patel had learned this practice from their previous work with pharmacies owned and controlled by Babubhai Patel.

Respectfully Submitted,  
BARBARA L. MCQUADE  
UNITED STATES ATTORNEY

/s/ John K. Neal  
JOHN K. NEAL  
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**CERTIFICATE OF SERVICE**

I hereby certify that on November 6, 2013, I caused a copy of the foregoing to be served on all counsel of record using the Court's ECF filing system.

/s/ John K. Neal  
John K. Neal